



1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000

www.wileyrein.com

Thomas J. Navin  
202.719.7487  
tnavin@wileyrein.com

March 15, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *Telephone Number Portability, et al*, WC Docket Nos. 07-149 & 09-109,  
CC Docket No. 95-116

Dear Ms. Dortch:

Neustar, Inc. ("Neustar") writes in response to the North American Portability Management LLC ("NAPM")'s March 12, 2018, ex parte letter<sup>1</sup> and other ex parte letters<sup>2</sup> which agree that a contingency rollback database and plan is critical to the Number Portability Administration Center ("NPAC") cutover, but nevertheless insist on an April 8, 2018, deadline for which there is no established rollback plan.

***If the FCC allows the NAPM to cutover the Southeast Region to iconectiv on April 8, 2018, there will be no contingency rollback (either automated or manual) to Neustar's database and services because the contractual and operational requirements necessary for such service would not exist.***<sup>3</sup>

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<sup>1</sup> See Letter from Todd D. Daubert, Counsel to the NAPM LLC, to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, WC Dockets Nos. 09-109, 07-149, and CC Docket No. 95-116 (Mar. 12, 2018).

<sup>2</sup> See, e.g., Letter from Lynn Follansbee, USTelecom Association Vice Pres., to Marlene Dortch, Secretary, Federal Communications Commission, WC Dockets Nos. 09-109, 07-149, and CC Docket No. 95-116 (Mar. 5, 2018).

<sup>3</sup> Change Order No.4 to Amendment 97 to Contractor Services Agreement for Number Portability Administration Center/Service Management System between Neustar, Inc. and the North American Portability Management LLC, § 5.3 (Establishing that Neustar has no contingency rollback obligations other than negotiated by the parties).

Ms. Marlene H. Dortch

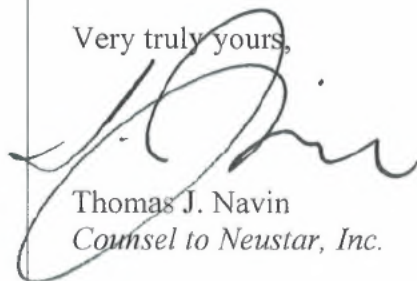
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In October 2016, Neustar offered to construct the NAPM's preferred automated, reliable contingency rollback solution. At that time, Neustar **estimated 6-9 months** for development and a cost of approximately \$1.5 million.<sup>4</sup> The NAPM rejected Neustar's proposal on May 12, 2017. The current predicament—reaching the cutover deadline without the capability for a contingency rollback—was entirely foreseeable and is the result of poor decision making and planning on the part of the NAPM. To suggest otherwise is false and misleading to the American public.

Please do not hesitate to contact me with any questions.

Very truly yours,



Thomas J. Navin  
*Counsel to Neustar, Inc.*

cc: Claude Aiken  
Amy Bender  
Matthew Berry  
Nicholas Degani  
Michele Ellison  
Lisa Fowlkes  
Thomas Johnson  
Debra Jordan  
Travis Litman  
Kris Monteith  
Nirali Patel  
Jay Schwarz  
Ann Stevens  
Jamie Susskind

<sup>4</sup> See Letter from Thomas J. Navin, Counsel to Neustar, Inc., to Marlene Dortch, Secretary, Federal Communications Commission, WC Dockets Nos. 09-109, 07-149, and CC Docket No. 95-116 (Feb. 23, 2018) (“[NAPM, TOM, and iconectiv] abandoned efforts to drive consensus on the specifics of an automated rollback plan only after delays in iconectiv's development combined with a constrained schedule generally.”).